



Eric Gonzalez
District Attorney

**DISTRICT ATTORNEY
KINGS COUNTY**

350 JAY STREET
BROOKLYN, NY 11201-2908
(718) 250-2000
WWW.BROOKLYNDA.ORG

[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: CONSUEGRA, SURABI

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure #1:

MOS CONSUEGRA WAS FOUND GUILTY OF THE FOLLOWING NYPD DEPARTMENTAL CHARGES AND SPECIFICATIONS:

1. MOS CONSUEGRA, ASSIGNED TO TRANSIT BUREAU CITF, ON 10/07/10, THE UNDERSIGNED ALONG WITH ANOTHER MEMBER OF SERVICE KNOWN TO THE DEPARTMENT, TBIU CONDUCTED PATROL MONITORING WITHIN THE CONFINES OF TRANSIT BOROUGH MANHATTAN. SAID MEMBERS CONDUCTED A STATION INSPECTION OF THE LOCATION AND FOUND MOS CONSUEGRA, ASSIGNED TO TRANSIT BUREAU CITYWIDE IMPACT TASK FORCE INSIDE OF TRANSIT AUTHORITY BREAK ROOM LOCATED IN REAR OF A TRANSIT AUTHORITY BOOTH. A FURTHER INQUIRY INTO THE MATTER DISCLOSED THAT MOS CONSUEGRA WAS FOUND TO BE OFF OF HER ASSIGNED POST. IN ADDITION, A FURTHER INQUIRY INTO THE MATTER DISCLOSED THAT SHE HAD OMITTED ACTIVITY LOG ENTRIES FOR SAID DATE. WHEN QUESTIONED REGARDING THESE FINDINGS, MOS CONSUEGRA COULD NOT PROVIDE A PLAUSIBLE EXPLANATION FOR HER NOTED MISCONDUCT. BASED ON THESE FINDINGS MOS CONSUEGRA LACKED THE PROFESSIONAL STANDARDS SET FORTH BY THIS DEPARTMENT IN THAT SHE FAILED TO EXHIBIT PRUDENT BEHAVIOR IN PERFORMING AND DOCUMENTING HER ASSIGNED DUTIES.

CASE STATUS: CLOSED ON 02/10/2011

ACTION TAKEN: SCHEDULE B COMMAND DISCIPLINE, FORFEITURE OF ONE (1) VACATION DAY

Disclosure #2:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 08/20/2017, AGAINST MOS CONSUEGRA:

1. OTHER DEPARTMENT RULES/PROCEDURES VIOLATION

CASE STATUS: CLOSED ON 08/09/2018

Disclosure #3:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATIONS, DATED 08/16/2018, AGAINST MOS CONSUEGRA:

- ALLEGATION 1: REPORT INCOMPLETE/INACCURATE - PROPERTY CLERK INVOICE
- ALLEGATION 2: INVOICE DISCREPANCY - LAB - MARIJUANA

CASE STATUS: CLOSED ON 08/27/2018

ACTION TAKEN: VERBAL INSTRUCTIONS

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE
UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.**

Eric Gonzalez
District Attorney
Kings County